

Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

AUDIT INFORMATION

Applicant Name:	Maharishi Vedic Organic Agriculture Institute (MVOAI)
Est. Number:	N/A
Physical Address:	2000 N. Court Street, Fairfield, IA 52557
Mailing Address:	PO Box 2006, Fairfield, IA 52556
Contact & Title:	Dale Monson, MVOAI Certification Coordinator
E-mail Address:	mvoai@maharishi.net
Phone Number:	641-209-6578
Auditor(s):	Rick Skinner
Program:	USDA National Organic Program (NOP)
Audit Date(s):	April 18-20, 2007
Audit Identifier:	NP7108EEA
Action Required:	Yes
Audit Type:	Surveillance - Accreditation Renewal Audit
Audit Objective:	To verify continuing compliance to the audit criteria
Audit Criteria:	7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000, Updated September 11, 2006
Audit Scope:	MVOAI's quality manual dated September 30, 2006, including personnel, processes, procedures, facilities, and related records.
Location(s) Audited:	Maharishi Ayurveda Products Incorporated (MAPI) – Colorado Springs, CO; Maharishi University of Management – Organic Farms – Fairfield, IA; and Maharishi Vedic Organic Agriculture Institute (MVOAI) – Fairfield, IA.

MVOAI was accredited as a certifying agent on April 29, 2002, to the USDA National Organic Program for crops, wild crops, livestock, and handling. MVOAI is currently only certifying to crops and processing/handling and has three clients located in Colorado, Iowa, and Venezuela.

Inspections are contracted and the final decision regarding certification is delegated to the Certification Committee facilitated by the Certification Coordinator. There are no members of the Board of Directors that are certified. The staff, inspectors, and Board of Directors are qualified based on their Vita information and records of training associated with the NOP. All persons with Program responsibilities have historic and current conflict of interest declarations, vitae, confidentiality agreements, evaluations and records of training pertinent to Program activities. There have been no appeals related to certification decisions. MVOAI has annually submitted the required documentation as outlined in the Rule in the form of an annual update.



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FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that MVOAI is currently operating in compliance to the audit criteria except as noted in the non-compliances below. Four non-compliances were identified during the audit.

NP7108EEA.NC1 – NOP § 205.504 (4)(b) states, "A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques... (4)(b) Administrative policies and procedures. (1) a copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates." In addition, the company's procedures require the use of a specified checklist in the label approval process. The procedure outlined in the MVOAI Procedures Manual includes the Organic Labeling Checklist Version 1.0 – IC-F-062 Revision B – April 25, 2002, for use in the approval process for labels submitted to the Certification Committee. A review of all approved labels shows that this checklist was never used in the approval process.

NP7108EEA.NC2 – NOP § 205.303 (b) states, "Agricultural products in packages described in § 205.301 (a) and (b) must:... (2) On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, "Certified organic by * * *," or similar phrase, identifying the name of the certifying agent that certified the handler of the finished product...". The inspection at MAPI found that "Organic Sesame Oil" was being bottled and labeled with a label that did not meet the requirements outlined in the rule, and that the label had never been submitted to the certifying agent for review.

NP7108EEA.NC3 – NOP § 205.501 (18) states, "Provide the inspector, prior to each on-site inspection, with previous on-site inspection reports and notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor non-compliances." *Records indicate that MVOAI is not currently notifying the contract inspectors of the certification decision or requirements associated with the correction of minor non-compliances*.

NP7108EEA.NC4 – NOP § 205.406 (a) states, "To continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable to the certifying agent: (1) an updated organic production or handling system plan which includes: (ii) any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, ... (3) An update on the correction of minor non-compliances previously identified by the certifying agent as requiring correction for continued certification" *The review of the organic system plan (OSP) during the witness inspection at MAPI revealed that the seven non-compliances identified during the previous inspection had not been addressed in the new OSP. Records at the certifier shows the non-compliances were addressed, but the OSP did not identify how all past non-compliances were addressed.*